



EX PARTE OR LATE FILED

**Pete Sywenki**  
Director, Federal Regulatory Relations

**Law & External Affairs**  
1850 M Street, NW, Suite 1100  
Washington, DC 20036  
Voice 202 828 7452  
Fax 202 296 3469  
pete.n.sywenki@mail.sprint.com

**EX PARTE**

July 27, 1998

Ms. Magalie Roman Salas  
Secretary - Federal Communications Commission  
1919 M Street, N.W. Room 222  
Washington, D.C. 20554

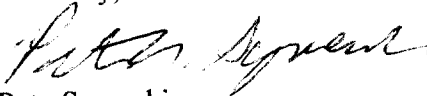
RE: CC Docket No. 98-104

Dear Ms. Salas,

Today, the attached information related to the above referenced docket was provided to the following members of the FCC's Common Carrier Bureau: Judy Nitsche, Jay Atkinson, Aaron Goldschmidt, Allen Barna, and Paula Cech. The information pertains to changes the Sprint Local Telephone Companies are committing to make in the definition and application of primary and non-primary lines and rates.

The original and one copy of this notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(b)(1) of the Commission's rules. If there are any questions, please call.

Sincerely,

  
Pete Sywenki

Attachment

cc: Judy Nitsche  
Jay Atkinson  
Aaron Goldschmidt  
Allen Barna  
Paula Cech

No. of Copies rec'd 041  
List ABCDE

## **Application of the Primary and Non-Primary Rates**

Recognizing that in its June 1st order in 97-250, the Commission, while not yet providing a definition, made clear indication that it believes location to be a key variable in the primary/ non-primary line distinction. In paragraphs 35 and 36 the Commission makes statements with strong leanings toward the location factor and in 36, it states that a line should be non-primary if billed to the same name at the same location. Based on that information, Sprint LTC has reviewed the tariffs of several other price cap local exchange companies. After reviewing the tariffs, Sprint LTC proposes to modify its definitions of primary and non-primary access lines. Most of the other LECs are including the service location as part of their definition instead of basing the distinction on a pure billing account definition as Sprint currently uses. Consistent with the definitions of the other LECs, Sprint LTC will make the following change to be implemented on 1-1-99.

### **Tariff Language:**

Until January 1, 1999, the primary rate is assessed to the residential subscriber line based on the main billing account number. Additional lines billed under the main billing account number will be assessed the non-primary rate.

Effective January 1, 1999, the designation of primary and non-primary will be changed as follows: The EUCL and PICC residence subscriber rate regulations are designated as either primary or non-primary. The primary rate is assessed to the residential subscriber line which is any or all of the following: 1) the only line provided at that service location; or 2) the line designated as primary by the billed party or parties at that service location at the point of ordering the service. In most cases only one line at a service location can be classified as primary, all others are considered to be non-primary.

### **Estimated Impact of Definition Change:**

Sprint has attempted to estimate the non-primary line penetration under this revised definition. Obviously the billing system changes can not be completed in time to precisely calculate the impact. The specific edits on customer location fields that we will implement in the billing system have not been fully defined. In place of the billing system results, we have analyzed extracted billing data contained in our MAPINFO system and other available data extracts. Alpha numeric edits of the customer location information were developed. Sprint believe these edits will approximate the non-primary line penetration that will result from the system changes but will likely vary.

Sprint has reviewed the results of several of its filing entities which comprise over 50% of total access lines. Specifically, data for Sprint's Florida, North Carolina, Ohio, Eastern (PA and NJ) and Northwest (OR and WA) entities were analyzed. Using the new definition and the method described above, non-primary line penetration rates that ranged from 3.7% to 7.7% under the old definition are now ranging from 8% to 12%. There is no reason to believe that Sprint LTC's other filing entities would not experience similar increases in non-primary line penetrations and a 10%+ system number is projected at the time of implementation.

### **Tariff Filing:**

Sprint LTC will file a revised access filing on 7-28-98. Included in that filing, among other things, will be the revised tariff pages describing the application of the primary and non-primary rates for SLC and PICC as shared above.